

UNITED STATES OF AMERICA,

- against -

HAMZA AHMED, et al.,

Defendants.

REDACTED

DECLARATION OF  
NAJI IBRAHIM

15-CR-49 (MJD/FLN)

Naji Ibrahim declares under penalty of perjury that the following is true and correct:

1. I am Hamza Ahmed's father, and submit this declaration in support of his motion for bail.

2. I work as an independent contractor as a medical transporter for pharmaceutical companies. I divorced my son's mother, Fathia Good, seven years ago, but maintain an amicable relationship with her. I currently live in North Minneapolis with my brother, Kamal Ibrahim, his wife, Naima Osman, and their five children, ranging in age from 2 to 13. My brother works as a

My sister-in-law

3. Were this Court to release my son on bail, Hamza would reside with me in the home of his uncle and aunt. Given the different work schedules of the adults in the home, there is almost always an adult in the home. Moreover, if the Court permits Hamza to reside with us, family members and friends have committed to become regular visitors to the house to accompany and engage with Hamza.

4. In addition, an adult will be available to escort Hamza to any activities outside the home, including religious services and instruction, volunteer work, education, and counseling. In addition to me, my brother and his wife, these adults – all of whom are U.S. citizens – include the following relatives and close friends:

Name	Relationship to Hamza Ahmed	Occupation	Length of time in the U.S.
Tahir	First cousin once removed	Rostered court and medical translator	16 years
Anwar	First cousin once removed	Driver of self-owned truck	16 years
Zahir	First cousin one removed	Driver of self-owned truck	18 years
Rabi	Uncle	Environmental services	21 years
Addulwasi	Father's close friend	Billing clerk	17 years
Mohamed /	Father's close friend	Cabdriver	26 years
Maruf	Cousin	Environmental services	15 years
Dilbi	Cousin	Graduate student	25 years (US born)
Fathi	Cousin	Lab technician	16 years
Asha	First cousin once removed	Personal care assistant	21 years
Fuad	Married to first cousin once removed	Cabdriver	25 years
Sada Mohamed	First cousin once removed	Environmental services	25 years
Rabi	Father's friend	Owner of cleaning company	25 years
Faiz	First cousin once removed		17 years
Mohamed	Father's friend	Owner of cleaning company	15 years

5. In my brother and sister-in-law's house, Hamza will be subject to strict rules, including the requirements that he promptly attend all activities arranged for him; assist in childcare and meal preparation; mow the lawn, garden and remove snow; study for his classes; attend religious services; and comply with all the terms of his bail. He will not have access to

secure all cell-phones and computers in the home so that Hamza does not have access to them.

6. Fathia Good lives in Savage – approximately 25 minutes away. She is welcome at my brother's house and will visit Hamza regularly, along with his siblings. Hamza is very close to his mother and siblings, and this will ensure that he can maintain a strong relationship with them.

7. My family and I were devastated when we learned of Hamza's removal from a flight bound to Turkey in November. We immediately held family councils, met with local community leaders and sought guidance from the Imams at the mosques we attend to address the situation. We removed Hamza's passport from him, and required him to return to classes at MCTC. He began attending classes there again this past spring. We advised him to stop posting on his Twitter account, which he did. I began systematically bringing Hamza to the mosque with me every Friday and religious holiday. I also had him join me occasionally on my work trips.

8. Were the Court to release Hamza on bail, my family and I will dedicate ourselves to ensuring that Hamza honors all his bail obligations, returns to his education, and focuses on being a productive member of our family and our community.

Date: Minneapolis, Minnesota  
June 19, 2015

Respectfully Submitted.



Naji Ibrahim